



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

February 28, 2020

BY ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. Zhongsan Liu*, S1 19 Cr. 804 (VEC)

Dear Judge Caproni:

Pursuant to the Court's order of February 14, 2020 in the above-referenced matter, the Government writes to respectfully notify the Court that as of February 27, 2020, it has produced all Rule 16 discovery currently in its possession to the defense. If the Government acquires any additional discoverable materials in the future, it will promptly disclose them.

Respectfully Submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

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cc: Defense Counsel (by ECF)